

May 17, 2017

VIA ECF

The Honorable Lorna G. Schofield
United States District Judge for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: ***Thind v. Healthfirst, Inc.*, Civil Docket No. 14-9539 (LGS)**

Dear Judge Schofield:

Pursuant to the Court's Orders dated April 13, 2017, April 28, 2017, and May 5, 2017 (ECF Nos. 302, 304, 306), Defendant HF Management Services, LLC ("Healthfirst") and Plaintiffs submit this joint status letter to provide "an update on whether and how the parties propose to move forward with this case," including the discussion of the following five issues:

- (1) Whether Mr. Thind proposes to represent Collective A or Collective B.
- (2) What plaintiff will represent the collective that Mr. Thind does not represent.
- (3) Whether the parties intend to move to amend the Amended Complaint.
- (4) Whether the two collectives intend to move forward as two separate actions or under a single complaint.
- (5) The parties' proposed next steps.

(ECF No. 302 at 1-2.)

Plaintiffs intend to move to amend the Amended Complaint. In doing so, Plaintiffs intend to move forward as two separate actions. At this juncture, Mr. Thind does not propose representing Collective B, but intends to represent Collective A. Plaintiffs will identify the representative for Collective B in the proposed amended complaint. Healthfirst reserves its right to oppose any motion(s) filed by Plaintiffs to amend the complaint.

If acceptable to the Court, the parties propose the following schedule: (1) Plaintiffs will file any motions to amend the complaint on or before June 16, 2017; and (2) Healthfirst will respond to any such motions on or before July 17, 2017.

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